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and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric  
Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

Bankruptcy Case  
No. 19 -30088 (DM)  
Chapter 11  
(Lead Case) (Jointly Administered)

**DECLARATION OF ELIZABETH COLLIER  
IN SUPPORT OF MOTION TO REDACT  
DOCUMENTS FILED IN SUPPORT OF  
SUPPLEMENTAL APPLICATION  
PURSUANT TO 11 U.S.C. §§ 327(a) AND  
328(a) AND FED. R. BANKR. P. 2014(a) AND  
2016 FOR AUTHORITY TO RETAIN AND  
EMPLOY PRICEWATERHOUSECOOPERS  
LLP AS MANAGEMENT, TAX, AND  
ADVISORY CONSULTANTS TO THE  
DEBTORS *NUNC PRO TUNC* TO PETITION  
DATE**

[No Hearing Requested]

1 I, Elizabeth Collier, pursuant to section 1746 of title 28 of the United States Code, hereby declare  
2 under penalty of perjury that the following is true and correct to the best of my knowledge, information,  
3 and belief:

4 I am employed as Managing Counsel, Litigation in the legal department of Pacific Gas and  
5 Electric Company (the “**Utility**”), a wholly-owned subsidiary of PG&E Corporation (“**PG&E Corp.**”  
6 and together with Utility, the “**Debtors**”). I joined the Utility in 2001 and have held various positions  
7 of increasing responsibility working on litigation, regulatory, and commercial matters, since that time.  
8 I obtained my Juris Doctorate from University of California, Hastings College of the Law in 1990 and  
9 was admitted to the State Bar of California that same year.

10 I am generally knowledgeable and familiar with the Debtors’ day-to-day operations, including  
11 the Debtors’ professional engagements with PricewaterhouseCoopers LLP (“**PwC**”). The facts set forth  
12 in this Declaration are based upon my personal knowledge, my review of relevant documents, and  
13 information provided to me by the Debtors’ other employees or the Debtors’ legal, restructuring, and  
14 financial advisors. If called upon to testify, I would testify to the facts set forth in this Declaration.

15 This Declaration is submitted in support of the *Motion to Redact Documents Filed in Support of*  
16 *Supplemental Application Pursuant to 11 U.S.C. §§ 327(a) and 328(a) and Fed. R. Bankr. P. 2014(a)*  
17 *and 2016 for Authority to Retain and Employ PricewaterhouseCoopers LLP as Management, Tax, and*  
18 *Advisory Consultants to the Debtors Nunc Pro Tunc to Petition Date* (the “**Redaction Motion**”) filed  
19 concurrently herewith, which seeks authority to redact certain confidential information subject to  
20 attorney–client privilege and the attorney work product doctrine that is the subject of the *Supplemental*  
21 *Application Pursuant to 11 U.S.C. §§ 327(a) and 328(a) and Fed. R. Bankr. P. 2014(a) and 2016 for*  
22 *Authority to Retain and Employ PricewaterhouseCoopers LLP as Management, Tax, and Advisory*  
23 *Consultants to the Debtors Nunc Pro Tunc to Petition Date* (the “**Supplemental Application**”), filed  
24 concurrently herewith.<sup>1</sup>

25 PwC performed a number of engagements for the Debtors prior to the Petition Date and PwC has  
26 developed institutional knowledge about the Debtors’ businesses, operations, accounting systems, and

27 \_\_\_\_\_  
28 <sup>1</sup> Capitalized terms used but not otherwise herein defined shall have the meanings ascribed to such terms  
in the Supplemental Application.

1 other material information. PwC is party to a number of contracts with the Debtors; however the Debtors  
2 are only seeking to redact information from ten of such contracts. Redacted copies of the Supplemental  
3 MSA Contracts are annexed to the Bowman Declaration. I prepared the redactions to the Supplemental  
4 MSA Contracts.

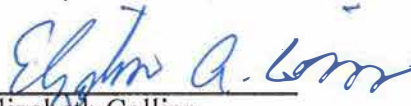
5 In addition to the relevant terms governing PwC's work and other critical services that have been,  
6 and will continue to be, performed by PwC for the benefit of the Debtors (which are described in detail  
7 in the Supplemental Application), certain Supplemental MSA Contracts describe work to be performed  
8 at the direction of counsel and information subject to the attorney-client privilege and the attorney work  
9 product doctrine. The Debtors have narrowly tailored their request to redact by limiting the redactions  
10 to information subject to the attorney-client privilege and the attorney work product doctrine, rather than  
11 all commercially sensitive information. Therefore, the Debtors seek to file certain Supplemental MSA  
12 Contracts with the limited redactions described above.

1 Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury, that the foregoing is true  
2 and correct.

3 Dated: November 5, 2019

4 Respectfully submitted,

5 By:

  
Elizabeth Collier